From: Fran Garland

Sent: Friday, March 25, 2005 6:20 PM

To: Dabbs, Paul

Cc: Steve Macauley (E-mail) Subject: Comments on Volume 1

## Paul--

Attached are Contra Costa Water District's comments on Vol. 1 of the CWP Update 2005. The comments are predominantly related to strengthening water quality aspects of the Plan, especially drinking water quality. Drinking water quality is a critical interest to CCWD and many other urban water agencies. We have advocated a greater emphasis on drinking water quality throughout development of the Plan. This draft addresses many of our earlier comments in this regard and we appreciate DWR's responsiveness to our concerns.

Also attached is a graph of degrading water quality at Rock Slough over time that is referred to in the comment on page 3-8. This is an example of the kind of data that would be meaningful in explaining salinity issues faced by Delta water users.

If you have any questions, please call.

Steve--for your information as Chair of the Urban Caucus, and as a fellow supporter of improving the water quality elements of the plan.

Thanks, Fran Garland Principal Planner Contra Costa Water District

<<3-25-05 comments on Vol. 1.doc>> <<Rock Slough Water Quality in the Fall.ppt>>

## Contra Costa Water District Comments on California Water Plan Update 2005 Public Review Draft Volume 1 March 25, 2005

- Page 1-3, Improve Water Quality: Change the emphasis to the multi-barrier approach advocated by EPA and other agencies and organizations—improve source water quality through pollution prevention and other means, and improve treatment. Matching water quality to end use should not be listed first, especially since it does not actually improve water quality, but rather is a management tool to maximize use of water of varying qualities.
- Pages 2-2 and 2-4, Foundational Actions: Change "Protect Water Quality" to "Protect and Improve Water Quality".
- Page 2-8, 1<sup>st</sup> bullet: remove "rigorously apply"; the funding preferences and evaluation criteria are set—applications will be scored accordingly.
- Page 2-11, penultimate bullet: This begs the question of "how" will the State help resolve long-standing water quality issues—is there a plan in mind or specific steps that can be outlined?
- Page 2-18, Recommendation 3: Suggest modifying to specifically address drinking water quality and public health protection; perhaps by adding a phrase to the end something like "... surface and groundwater quality to ensure high quality drinking water supplies for all Californians."
- Page 2-25, Box 2-5: Note the Delta Improvements Package now includes Relocation of CCWD's Old River Intake. May want to check the current listing of DIP projects.
- Page 3-5, 6<sup>th</sup> paragraph: The issue is not just about water quality impacts from water management activities, but should reference the current state of water quality and expected trends into the future, including more stringent drinking water regulations, etc. The importance of the multi-barrier approach to ensuring drinking water quality should be mentioned.
- Page 3-8, Contamination of Surface Water and Groundwater: Suggest adding a box here to expand on the salinity issue. Points to make include 1) why salinity is important (relationship to DBPs, treatment costs, impacts on discharges and recycling, etc.); 2) salinity is increasing in the Delta over time, a source of drinking water for 23 million people. I have attached a graph to my e-mail showing salinity increases at Rock Slough—a similar graph at a more central location would help illustrate the points; 3) what is being done in re salinity issues in the Delta and Colorado River.

Page 3-13, SF Bay Region: Why is the Hetch Hetchy debate the focus of the summary of SF Bay area regional challenges? Suggest eliminating the references to restoring Hetch-Hetchy and expanding on the supply reliability and water quality issues facing a majority of the region that are described in Vol. 3.

Page 3-34, Area of Origin: the phrase "being depleted by the projects" has a pretty negative connotation. The area of origin statutes provided assurances that the projects would not export water that is needed in the areas of origin. Try to describe this in a more neutral way.

Page 3-51, Box 3-51, 7<sup>th</sup> Bullet: split into two-- Bay Area Water Agencies Coalition is one and the SF Bay Area Integrated Regional Water Management Plan is another.

Page 5-10, Recommendation 3: See comment on page 2-18 above. Also, suggest adding an Action to address improving drinking water quality--something like: "The State will support local agency projects to address drinking water quality issues by insuring impacts on source water from State projects are fully mitigated and giving a preference to projects that address drinking water quality when implementing grant programs."

## Water Quality has Significantly Degraded at CCWD's Rock Slough Intake in the Fall

- Since the late 1970s water quality has degraded significantly in the fall
- Wet years are as salty as dry years
- Except in El
   Niño years, the
   best months are
   now worse than
   the worst
   previously

